

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE CHIN

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UNITED STATES OF AMERICA,

- v. -

RANDY WILSON,
a/k/a "John Blacklow,"

Defendant.

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Indictment

07 Cr.

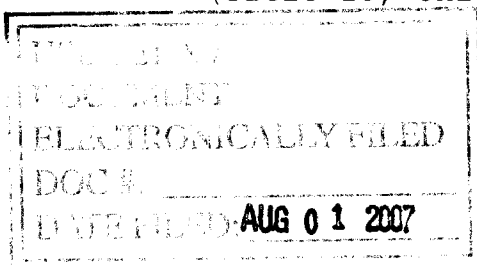
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COUNT ONE

The Grand Jury charges:

1. From on or about May 2006, up to and including in March 2007, in the Southern District of New York and elsewhere, RANDY WILSON, a/k/a "John Blacklow," the defendant, and others known and unknown, unlawfully, willfully and knowingly, did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and did obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, WILSON fraudulently obtained financing from North Fork Bank for the purchase of an automobile, using the name and identity of another.

(Title 18, United States Code, Sections 1344 and 2.)



Count Two

The Grand Jury further charges:

2. From in or about May 2006, up to and including in or about July 2006, in the Southern District of New York and elsewhere, RANDY WILSON, a/k/a "John Blacklow," the defendant, and others known and unknown, unlawfully, willfully, and knowingly, and with intent to defraud, as part of an offense affecting interstate commerce, did effect transactions, with one and more access devices issued to another person and persons, to receive payment and other things of value during any one-year period, the aggregate value of which is equal to and greater than \$1,000, to wit, the defendant used, without authorization, the credit card of another individual, and obtained in excess of \$1,000 in goods and money.

(Title 18, United States Code, Section 1029(a)(5) and 2.)

COUNT THREE

The Grand Jury further charges:

3. From in or about May 2006, up to and including in or about March 2007, in the Southern District of New York and elsewhere, RANDY WILSON, a/k/a "John Blacklow," the defendant, and others known and unknown, unlawfully, willfully and knowingly, did transfer, possess and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Section

1028A(c), to wit, the defendant possessed and used personal information of another person to commit the bank fraud and access device fraud charged in Counts One and Two of this Indictment.

(Title 18, United States Code, Section 1028A and 2.)

FORFEITURE ALLEGATION

4. As a result of committing one or more of the foregoing offenses alleged in Counts One through Three of this Indictment, defendant RANDY WILSON, a/k/a "John Blacklow," shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the foregoing fraud offenses, including but not limited to the following:

a. At least \$2,393.93 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the credit card fraud offense alleged in Count Four of the Indictment.

b. The 2001 BMW X5 with Vehicle Identification Number WBAFA53501LM77908, in that such property was obtained as a result of the bank fraud and identity theft offenses alleged in Counts One through Three of the Indictment.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

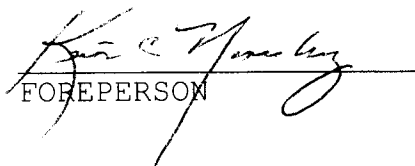
(3) has been placed beyond the jurisdiction of the Court;

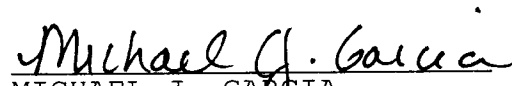
(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982 and Title 18, United States Code, Sections 1014, 1341, 1343, 1344.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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Defendant.

INDICTMENT

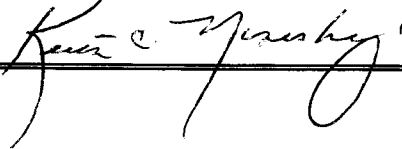
07 Cr.

(18 U.S.C. §§ 1344, 1028A, 1029(a)(5) and 2)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Foreperson.



8/1/07
WJ

Filed Indictment case assigned to Judge Chin
Pitman
U.S.M.T.